

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

\$45,000.00 IN UNITED STATES  
CURRENCY AND 2001 ITASCA  
SUNCRUISER MOBILE HOME,  
VIN 5B4LP57G013332941,

Defendant.

8:12CV320

STIPULATION

COME NOW the Plaintiff, United States of America, the Defendant property, and the Claimant, Hugo L. Soto, all by and through counsel, and hereby agree and stipulate as follows:

WHEREAS, on September 10, 2012, Plaintiff filed a Verified Complaint for Forfeiture, alleging the Defendant properties were proceeds traceable to the exchange of controlled substances, or alternatively, were used or were intended to be used to facilitate the possession and distribution of controlled substances, and are therefore forfeitable to the United States pursuant to Title 21, United States Code, Section 881(a); and,

WHEREAS, Hugo L. Soto filed a Claim (Filing no. 9) and an Answer (filing no. 10) herein, denying any knowledge of the Defendant properties' alleged involvement with controlled substances; and,

WHEREAS, by Order dated September 18, 2012 (Filing No. 6), the United States published notice of its intent to dispose of the Defendant properties in such a manner as the Attorney General may direct. A Declaration of Publication was filed herein on December 5, 2012 (Filing No. 14). Other than Hugo L. Soto, no other person or entity has filed a Claim or an Answer within the prescribed time; and

WHEREAS, the parties desire to amicably settle this matter, without the necessity of trial.

NOW, THEREFORE, in consideration of the covenants contained herein, the parties hereby agree as follows:

1. Thirty thousand dollars of the Defendant currency shall be returned to the Claimant. Payment will be tendered to the trust account of the Claimant's attorney, Matt Catlett.
2. The remaining Defendant properties, viz., \$15,000.00 and the 2001 Itasca Suncruiser Mobile Home, VIN 5B4LP57G013332941, shall be considered forfeited to the United States and shall be disposed of by the U.S. Marshals Service.
3. Plaintiff and Claimant shall each pay their own costs and attorney's fees associated with this lawsuit.
4. Mr. Catlett shall file a Receipt once he receives the funds. Thereafter, the parties shall file a joint stipulation for dismissal.

UNITED STATES OF AMERICA,  
Plaintiff

DEBORAH R. GILG  
United States Attorney

*s/Nancy A. Svoboda*

DATED: April 29, 2014

By: \_\_\_\_\_

NANCY A. SVOBODA (#17429)  
Assistant United States Attorney  
1620 Dodge Street, Suite 1400  
Omaha, Nebraska 68102-1506  
(402) 661-3700

\$45,000.00 IN UNITED STATES  
CURRENCY AND 2001 ITASCA  
SUNCRUISER MOBILE HOME,  
VIN 5B4LP57G013332941, Defendants,  
and HUGO L. SOTO, Claimant

DATED: May 5, 2014

By: 

MATT CATLETT (#21699)  
Attorney at Law  
701 P Street, Suite 207  
Lincoln, Nebraska 68508  
402-435-0303  
[matt@catlettlaw.com](mailto:matt@catlettlaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify on May 5, 2014, I caused the foregoing to be electronically filed with the Clerk of the Court of the United States District Court for the District of Nebraska by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.



MATT CATLETT  
Attorney at Law